



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUL 19 2012

Mr. Michael E. Shope
Environmental Program Manager
Federal Bureau of Investigation
Quantico, VA 22135

RE: Plan for Self-Implementing On-Site Cleanup of PCB Remediation Waste from the Carpeting, HVAC System and Window Caulking, Building 8 at the FBI Academy, Quantico, Virginia, EPA Case Tracking No. 2012-61-031 (FBI Project No. M6384-2012)

Dear Mr. Shope:

This letter is in response to the FBI Training Academy, Quantico VA, Plan for Self-Implementing On-Site Cleanup of PCB Remediation Waste from the Carpeting, HVAC System and Window Caulking, Building 8, dated July 16, 2012, ("Plan") provided to the U.S. Environmental Protection Agency Region III ("EPA") pursuant to the requirements of the *Self-implementing on-site cleanup and disposal of PCB remediation waste* regulation, 40 C.F.R. § 761.61(a). This Plan was received by the Land and Chemicals Division on July 18, 2012, regarding the FBI Training Academy's plan to clean up and dispose of polychlorinated biphenyl (PCB) waste located in the FBI Training Academy, Quantico, Virginia.

EPA has reviewed the FBI's Plan for Self-Implementing On-Site Cleanup for the carpeting, heating ventilation and air conditioning ("HVAC") systems, and window caulking found throughout Building 8 of the FBI Training Academy site and finds that with the exception of the alternate sampling procedures to be used to verify completion of the remediation, it is consistent with the requirements of 40 C.F.R. § 761.61(a). EPA finds that this alternative sampling approach will create no unreasonable risk under the PCB regulations and the conditions of this approval. EPA approves the alternative sampling under 40 CFR §761.61(c).

This approval relates only to the removal of the PCB contaminated carpeting, HVAC systems, and window caulk found throughout Building 8. EPA is aware that there are several other PCB concerns at the FBI Academy, which are not addressed in this Plan. This approval is issued with the understanding that the following issues will be addressed in future submissions to EPA Region 3 by the FBI Training Academy: the identification, characterization, and disposition of PCB contaminated duct lining/insulation, HVAC gasket material, vibration dampeners, caulk on HVAC systems, foam rubber on duct work, paint on HVAC equipment and floors, window caulk, and associated PCB contaminated dust throughout the rest of the facility.

EPA's approval of the FBI's Plan does not in any way constitute a finding by EPA that the FBI Training Academy site will be safe or appropriate for any future use, does not insulate the owner or occupant of the property from action under any applicable law, and does not relieve the FBI, or any other owner or operator of the FBI Training Academy site of its continuing responsibility to comply fully with 40 C.F.R. Part 761. EPA emphasizes that these regulations include several conditions and limitations that apply to persons performing a PCB cleanup activity subject to 40 C.F.R. § 761.61(a). Among other things, the regulations state that "[c]omplete compliance with 40 C.F.R. § 761.61 does not create a presumption against enforcement action for penalties for any unauthorized PCB disposal," 40 C.F.R. § 761.50(b)(3)(ii)(B). Further, "[a]ny person storing or disposing of PCBs is also responsible for determining and complying with all other applicable Federal, state, and local laws and regulations," 40 C.F.R. § 761.50(a)(6).

EPA is requesting that a brief summary of the completed cleanup activities, including but not limited to, characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; copies of manifests; copies of certificates of disposal or similar certifications issued by the disposer and total amounts of PCB waste disposed, be submitted within 90 days of completion to:

U.S. Environmental Protection Agency
Region III
Kyle Chelius (3LC61)
Land and Chemicals Division
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Any questions concerning this approval or the self-implementing site cleanup plan review should be directed to Kyle Chelius, TSCA Compliance Officer, at (215) 814-3178.

Sincerely,



Abraham Ferdas, Director
Land and Chemicals Division

cc: Ms. Patricia McMurray (Virginia DEQ)